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HARRISBURG, PA

AUG 30 2002

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

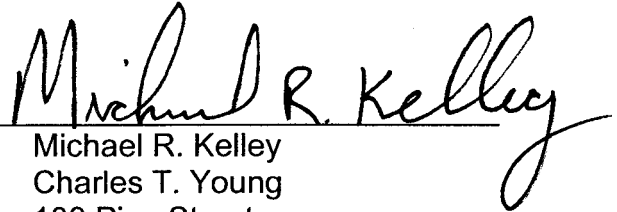
Nancy Hall, individually and as the Representative and Administratrix of the Estate of Tommy Hall, deceased, her husband, Plaintiff	:	CIVIL ACTION - LAW
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	:	
v.	:	1:01-CV-1265
	:	
	:	
Cuna Mutual Group, Cuna Mutual Insurance Society, Defendants	:	(Judge Christopher C. Conner)

DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGMENT

For the reasons expressed in the accompanying brief, Defendants hereby file this Motion for Partial Summary Judgment, and request that (1) judgment be entered in favor of CUNA and against Plaintiffs on their bad faith claim(s), (2) judgment be entered in favor of CUNA and against Plaintiffs on the fraud claim, (3) judgment be entered in favor of CUNA and against Plaintiffs on the negligence claims, (4) judgment be entered in favor of CUNA and against Plaintiffs as to the claims for pain and suffering and emotional distress, (5) Paragraphs 24 to 27 and 29 of the Plaintiffs' Amended Complaint

be dismissed, and (6) CUNA Mutual Group be dismissed as a defendant, and the term CUNA Mutual Group be stricken from the caption of the Amended Complaint.

McNees Wallace & Nurick LLC

By 

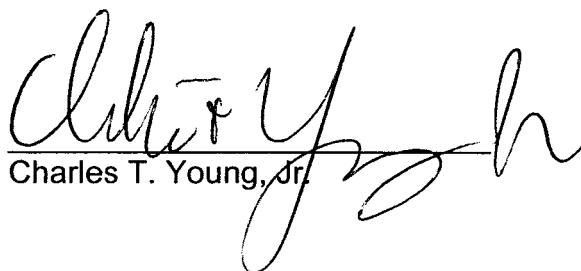
Michael R. Kelley
Charles T. Young
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 237-5322
Fax: (717) 237-5300

Attorneys for Defendants

Dated: August 30, 2002

CERTIFICATE OF NONCONCURRENCE

I, Charles T. Young, Jr., hereby certify that I have contacted Plaintiffs' counsel, Stephen R. Pedersen, and he does not concur in this Motion for Partial Summary Judgment.


Charles T. Young, Jr.

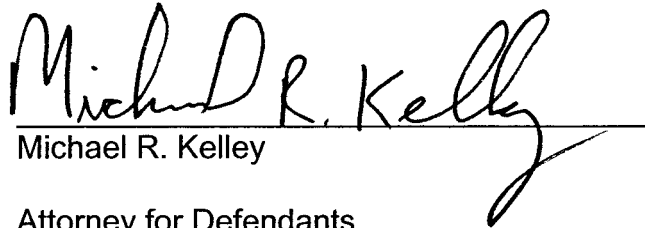
Date: August 30, 2002

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date the foregoing document was served by U.S. first-class mail, postage prepaid, upon the following:

Stephen R. Pedersen, Esquire
214 Senate Avenue, Suite 602
Camp Hill, PA 17011

Catherine Mahady-Smith, Esquire
3115-A N. Front Street
Harrisburg, PA 17110


Michael R. Kelley
Attorney for Defendants

Dated: August 30, 2002